

**From:** Dzanis@aol.com  
**Sent:** Friday, September 01, 2006 3:35 PM  
**To:** NOSB Processing  
**Subject:** comments on pet food interim report

**Attachments:** ATTACHMENT.TXT

Below please find comment on the April 7, 2006 Interim Report of the NOP Organic Pet Food Task Force:

Amendment of the regulations to expressly provide for organic labeling of pet foods and specialty pet foods is sorely needed. As the public seeks out these products and the market continue to grow, manufacturers require clear guidance in how to label them in a truthful and consistent manner. The sound and well thought out recommendations by the Pet Food Task Force will go far in meeting this need. Especially important are the recommendations to facilitate the addition of new ingredients to the National List. For example, taurine, a dietary essential nutrient of cats, must be added to virtually all nutritionally complete and balanced cat foods. Unless and until synthetic ingredients such as taurine are allowed for inclusion in organic pet foods, the growth of the organic segment of this market will be seriously hindered.

One suggestion regarding the Task Force's proposed amendments relates to how it deals with foods for specialty pets (e.g., small mammals, birds, fish, reptiles). Inclusion of foods for these species in the new pet food rules would be of great service to the industry and public. The proposed amendments define "pet," "specialty pet," "pet food," and "specialty pet food" (7 CFR 205.2) similarly to the Association of American Feed Control Officials (AAFCO). However, unlike AAFCO, the regulations to which the definitions are pertinent only reference "pet food" and not "specialty pet food." While there is an added caveat in the "pet food" definition to include "specialty pet food" when applied to the regulations, such wording is clumsy at best. Since it does not appear that there is to be a regulation that is intended to apply to foods for dogs and cats but not those for specialty pets, and the only use of "specialty pet food" is in the definition of "pet food," it would appear much clearer for the purposes of these regulations to simply define "pet" more broadly as to incorporate specialty pets (e.g., "Pet: dog, cat, or any domesticated animal normally maintained in a cage or tank, such as, but not limited to..."), and to define "pet food" as simply "any commercial feed prepared and distributed for consumption by *pets*" instead of "...by dogs and cats." In that way, the definitions for "specialty pet" and "specialty pet food" become unnecessary and can be deleted. Since the definitions would only apply to the organic regulations, that modification would not create a conflict with AAFCO Model Pet Food Regulations.

The Task Force also recommends that foods for horses, llamas, alpacas, rabbits and wild birds not be included in the new pet food rules, but rather the already existing livestock rules should apply. However, except for horses (which are already defined as "livestock"), the amendments would cause products for these species to fall into a regulatory limbo, as it would be unclear based on the definitions to what category foods for these species belonged. Without some additional clarification, for example, rabbits may easily be presumed to be part of the specialty pet food category. Thus, it is respectfully suggested that "other ruminants," "rabbits," and "wild birds" be expressly included in the "livestock" definition.

Thank your for the opportunity to comment. The Task Force should be commended for its excellent work. With the above suggestions, the proposed amendments will be very helpful to the organic pet food and specialty pet food industry and to the public.

Sincerely,  
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